

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Mohammed I Yazdani  
Darlene V Cmelka

Debtors

Bankruptcy No. 19-05069  
Judge LaShonda A. Hunt  
Chapter: 13

**OBJECTION TO CONFIRMATION**

NOW COMES U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2017-D, Mortgage-Backed Notes (hereinafter “Movant”), through its attorney, Josephine J. Miceli of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The above-captioned Chapter 13 case was filed on February 27, 2019.
2. The Movant, a party in interest, holds a Mortgage dated November 17, 2006 on the property located at 3619 Hamilton Avenue N, Chicago, Illinois 60618, in the original amount of \$417,000.00.
3. Movant is in the process of preparing the proof of claim and anticipates the claim will be filed by the bar date.
4. Movant estimates the arrears to be approximately \$60,491.06.
5. The Debtors plan provides that the Chapter 13 Trustee is to pay the Movant \$36,309.44 for its arrearage claim. Said plan does not fully pay Movant’s actual claim and as such, the plan is unfeasible.

6. By not paying the full amount of Movant's claim, the proposed plan modifies the rights of the Movant and such modification is inconsistent with the provisions of 11 U.S.C. 1322(b)(2) and as such, the plan does not comply with the Bankruptcy Code.

WHEREFORE, U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2017-D, Mortgage-Backed Notes prays that confirmation of the Debtors' plan be denied and for such other relief as the Court deems just.

/s/ Josephine J. Miceli

Josephine J. Miceli, ARDC #6243494  
Attorney for U.S. Bank National Association,  
as Indenture Trustee on behalf of and with  
respect to Ajax Mortgage Loan Trust 2017-D,  
Mortgage-Backed Notes

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**NOTICE:**

THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION  
OBTAINED WILL BE USED FOR THAT PURPOSE